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*Counsel for Trans Union, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY (TRENTON)**

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CYNTHIA HUGHES,  
Plaintiff,

CASE NO. \_\_\_\_\_

vs.

Judge \_\_\_\_\_

VERIZON WIRELESS;  
CAPITAL ONE; CAPITAL ONE  
AUTO FINANCE; TRANS UNION;  
EXPERIAN; and EQUIFAX;  
Defendants.

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**TRANS UNION, LLC'S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the Superior Court of New Jersey, Monmouth County, Law Division, to the United States District Court for the District of New Jersey, on the following grounds:

1. Plaintiff Cynthia Hughes served Trans Union on or about September 12, 2013, with a Summons and Complaint filed in the Superior Court of New Jersey, Monmouth County, Law Division. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff alleges that she was concerned about her credit and “discovered [she] had some inaccuracies and started writing letters to the three major credit reporting agencies,” “there are still some negative items that remain and are causing [her] great hardship in trying to continue to build her credit worthiness” and “[she] has written Experian, Equifax and Trans Union and... asked them to remove [her]... discharged bankruptcy.” See Complaint. These claims and allegations implicate the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). Plaintiff also seeks damages for her injuries including “\$25,000 dollars [sic] each for damages.” See Complaint. These damages are potentially recoverable under the FCRA.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Superior Court of New Jersey, Monmouth County, Law Division, to the United States District Court for the District of New Jersey.

5. To the best of Trans Union’s knowledge, the other named Defendants in this matter have not been served as of the date of this Notice of Removal. Trans Union has confirmed with the Clerk of the Superior Court of New Jersey, Monmouth County, Law Division that they have no document or file suggesting any other Defendant has been served.

6. Notice of this removal will promptly be filed with the Superior Court of New Jersey, Monmouth County, Law Division and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Superior Court of New Jersey, Monmouth County, Law Division to this United States District Court, District of New Jersey.

Date: September 13, 2013

Respectfully submitted,

*s/William R. Brown*

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*Counsel for Defendant Trans Union, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **13<sup>th</sup> day of September, 2013**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **13<sup>th</sup> day of September, 2013**, properly addressed as follows:

<b><u>Pro Se Plaintiff</u></b> Cynthia Hughes 1706 Coral Path Wall, NJ 07719	
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s/ William R. Brown  
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